

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

San Francisco, California 94111-4788

Telephone: (415) 875-6600

Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANT OTTO TRUCKING'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO RESPONSE
TO PLAINTIFF'S LIST OF ALLEGED
DISCOVERY MISCONDUCT**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Otto Trucking’s Administrative
7 Motion to File Under Seal Exhibits to Response to Plaintiff’s List of Alleged Discovery Misconduct
8 (the “Administrative Motion”). The Administrative Motion seeks an order sealing the entirety of
9 Exhibit 2 to the Response to Plaintiff’s List of Alleged Discovery Misconduct (“Exhibit 2”).

10 3. The entirety of Exhibit 2 contains or refers to confidential technical information, which
11 Waymo seeks to seal.

12 4. Exhibit 2 (entire document) contains, references, and/or describes Waymo’s
13 confidential technical information. The information Waymo seeks to seal includes the confidential
14 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR
15 designs, which Waymo maintains as secret. I understand that these designs are maintained as secret
16 by Waymo (Dkt. 25-47) and that the designs are valuable to Waymo’s business (Dkt. 25-31). The
17 public disclosure of this information would give Waymo’s competitors access to descriptions of the
18 functionality or features of Waymo’s autonomous vehicle system. If such information were made
19 public, I understand that Waymo’s competitive standing would be significantly harmed.

20 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit 2 that merit
21 sealing.

22
23 I declare under penalty of perjury under the laws of the State of California and the United
24 States of America that the foregoing is true and correct, and that this declaration was executed in San
25 Francisco, California, on August 29, 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor
28 Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven